

COURT
OF MASS.

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

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MBD NO. 04-10054-MEW 2004 FEB 24 P 5: 58

v.

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ROBERT RAMOS

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ASSENTED-TO MOTION TO EXTEND TIME WITHIN WHICH
INDICTMENT MUST BE FILED

The United States of America moves to extend the time within which an Indictment must be filed in the case captioned United States v. Robert Ramos, Criminal Complaint Number 03-907-MBB. On February 20, 2004, this Court denied, without prejudice, the government's prior motion to extend the time within which an Indictment must be filed in the case because the defendant "was arrested on December 10, 2003 and the docket does not reflect a prior extension." The government hereby attaches the motion it filed on December 17, 2003 to extend the time within which an Indictment must be filed in the above-captioned case. The attached motion reflects that the Court allowed the government's motion on December 22, 2003 and issued an order of excludable delay from December 17, 2004 through February 24, 2004. Accordingly, the government submits that the time period that 18 U.S.C. §3161 provides for indictment has not expired in this case.


Based on the foregoing, the government moves for the Court to extend the time within which an Indictment must be filed in this case. The parties have been engaged in discussions which may resolve this case prior to the filing of an indictment. The parties anticipate that those discussions will be completed on or about March 30, 2004. For the foregoing reasons, the government requests that the time within which an Indictment must be filed in this case be extended until March 30, 2004. The government further moves that the Court issue an order of excludable delay to include the time from the filing of this motion until March 30, 2004.

Defendant Robert Ramos, through his counsel of record, assents to this motion.

Respectfully submitted,

MICHAEL J. SULLIVAN
UNITED STATES ATTORNEY


By:


EMILY R. SCHULMAN
Assistant U.S. Attorneys

Dated: February 24, 2004

CERTIFICATE OF SERVICE

I, Emily R. Schulman, hereby certify that I have served a copy of the foregoing motion on Jeffrey Denner, Esq., Denner Associates, P.C., Four Longfellow Place, Suites 3501-06, Boston, MA 02114, by first-class mail, postage prepaid this date.


EMILY R. SCHULMAN
Assistant U.S. Attorney

FILED
UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA 2003 DEC 17 P 12:29
MAG. JUDGE NO.: 03-907-MBB

v.

U.S. DISTRICT COURT
DISTRICT OF MASS.

ROBERT RAMOS

03 MBD 10403

ASSENTED-TO MOTION TO EXTEND TIME WITHIN WHICH
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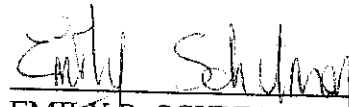
Pursuant to Title 18, United States Code, Section 3161(b), the United States of America moves to extend the time within which an indictment must be filed in the above-captioned case.

As ground for this motion, the government states that the grand jury to which the evidence in this case will be presented is not in session for the next two weeks and that scheduling conflicts after that time preclude the timely presentation of this matter to the grand jury. Consequently, the government moves to extend until February 24, 2004 the time by which an indictment must be filed in the above-captioned case. The government further moves that the Court issue an order of excludable delay to include the time from the filing of this motion until February 24, 2004. Defendant Robert Ramos, through his counsel of record, assents to this motion.

Respectfully submitted,

MICHAEL J. SULLIVAN
UNITED STATES ATTORNEY

By:


EMILY R. SCHULMAN
Assistant U.S. Attorneys

Dated: December 17, 2003

CERTIFICATE OF SERVICE

I, Emily R. Schulman, hereby certify that I have served a copy of the foregoing motion on Jeffrey Denner, Esq., Denner Associates, P.C., Four Longfellow Place, Suites 3501-06, Boston,

Allowed. R.D. Stearns 05-12-22-03.

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